

## Exhibit 20

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## Exhibit 21

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## Exhibit 22

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**AARON HIRSCH, individually and on  
behalf of all others similarly situated,**

**Plaintiff,**

**v.**

**USHEALTH ADVISORS, LLC and  
USHEALTH GROUP, INC.,**

**Defendants.**

**Civil Action No. 4:18-cv-245-P**

**DECLARATION OF MAX MACCOBY**

I, Max Maccoby, state as follows:

1. I am over 18 years old, have personal knowledge of the facts stated herein, and can testify competently thereto if called upon to do so. I provide this declaration in support of Plaintiff's Motion for Class Certification.

2. I serve as one of Plaintiff's counsels in this case. I am an experienced litigator with 23 years of criminal and commercial litigation experience who has tried cases to verdict in California, Illinois, Louisiana, Maryland, Virginia, and the District of Columbia.

3. I served as a criminal prosecutor in the Felony Trial Division of the Cook County State's Attorney's Office, IL, where I litigated financial, sex assault, murder, and dozens of other crimes, and was qualified by the Capital Litigation Trial Bar of Illinois to try death penalty cases.

4. Regarding large commercial litigation matters, I have served with class counsel in the matter of *In re Peregrine Financial Group Customer Litigation* Civil Action No. 12 C 5546,

2015 WL 1344466 (N.D. Ill. Mar. 20, 2015) (commodities Ponzi scheme that resulted in a \$44.5 million recovery).

5. I was plaintiff's counsel in wrongful death pharmaceutical cases, including *Jackson v. Pfizer, Inc.* CV-2009-034593 (Ariz. Super. Ct. June 25, 2012), and *DeOrsey v. CVS Pharmacy, Inc.* 50-2010-CA-011130XXXXMP-AO (Fla. Cir. Ct. Sept.14, 2013).

6. I was plaintiff's counsel in seven False Claims Act cases involving Medicare fraud, fraudulent government overcharging, and fraudulent tax avoidance, including *US ex rel. Belak v. ESS* WDO-08-0162 (D. Md. Jan. 26, 2012); *US ex rel. Gomez v. The Washington Home*, 09:1549 (D.D.C. 2012); *U.S. ex rel. Saunders v. Unisys Corp.*, No. 1:12-CV-00379 GBL, 2014 WL 1165869 (E.D. Va. Mar. 21, 2014); *United States v. Unisys Corp.*, 178 F. Supp. 3d 358 (E.D. Va. 2016); *Grabcheski v. Am. Int'l Grp., Inc.*, 687 F. App'x 84 (2d Cir. 2017); *US ex rel. Connors v. BTG International*, 1:14-cv-387 (APM)(D.D.C. May 11, 2016); and am currently litigating *NY ex rel. Grabcheski v. Am. Int'l Grp., Inc.*, 103125/2012 (N.Y. Supr. Ct.).

7. I was defense counsel in False Claims Act claims alleging fraudulent SBA payments in *United States ex rel. PCA Integrity Assocs., LLP v. NCO Fin. Sys., Inc.*, No. CV 15-750 (RC), 2020 WL 686009 (D.D.C. Feb. 11, 2020).

8. I was defense counsel in *Leidos, Inc. v. Hellenic Republic*, 881 F.3d 213, 214 (D.C. Cir. 2018) (€39,818,298 arbitration claim on security services at the 2004 Olympics).

9. I was defense counsel in *F.T.C. v. Nationwide Connections, Inc.*, No. 06-80180-CIV-RYSKAMP, 2008 WL 2279410 (S.D. Fla. Aug. 27, 2007) (FTC enforcement action alleging over \$25 million in improper consumer billing).

10. A resume of WGLG is attached.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
April 30, 2020.

/s/ Max Maccoby  
Max Maccoby



## WASHINGTON GLOBAL LAW GROUP

Washington Global Law Group, formed in 2018, is a boutique business transactions and litigation firm in Washington, D.C. focusing on international and government transactions and litigation. The attorneys at Washington Global Law Group are:

Max F. Maccoby concentrates in complex civil litigation in the areas of product liability and commercial disputes, including breach of contract, employment, malpractice, securities and commodities, pharmaceutical claims, the Telephone Consumer Protection Act, and the False Claim Act. He was previously an Assistant State's Attorney in Chicago, Illinois, where, qualified to try death penalty cases, he was lead counsel or co-counsel in several dozen jury trials and hundreds of bench trials, including murder, attempt murder, sex assault, and reckless homicide. He has tried cases to verdict in California, Illinois, Louisiana, Maryland, Virginia, and the District of Columbia. He was educated at University of Chicago, B.A., Syracuse University College of Law, J.D., Excellence in Jurisprudence of Human Rights.

Stephen C. Schott concentrates litigation disputes at the World Bank, International Monetary Fund, and United Nations. He is an attorney with a storied career and a deep understanding of international development issues, with a special focus on Africa. As a former World Bank regional Division Chief and Adviser on aid coordination and co-financing, Stephen has been in private international practice since 1987. His long experience working on project financing in Africa is complemented by a private sector specialization in privatization. He was educated at Harvard University Law School, JD, Fordham University, BA.

John Montgomery specializes in legal and business counseling and government relations services to companies pursuing business with the U.S. Federal Government. As a former Navy officer and Under Secretary of the Navy, his practice focuses primarily in the areas of acquisition

policy, national defense and homeland security programs, research and development, renewable energy, maritime and ship repair, and authorization and appropriations matters. He also has 15 years experience representing Guam and Hawaii businesses and organizations, and assists U.S. mainland and foreign companies seeking to participate in the DOD build-up on Guam. He was educated at Harvard University, John F. Kennedy School of Government, Executive Fellow Defense Systems Management College, Program Managers Course. Georgetown University Law Center, L.L.M. University of Missouri, J.D. United States Naval Academy, B.S.

Patrick B. Fazzone is an advisor to U.S. and overseas-based companies doing business in the United States and internationally. For more than twenty-five years Patrick has helped clients from all industry sectors navigate the complex legal and regulatory environment facing them in the U.S. and in international markets. His focus is to understand clients' businesses and growth objectives and assist them in achieving their goals. He was educated at Duke University School of Law, J.D. Note and Comment Editor Duke Law Journal Moot Court Board University of Connecticut, B.A. Magna cum laude with Distinction in Political Science Phi Beta Kappa Fulbright Scholar.

Tembiso Nleya specializes in administrative tribunal and arbitration employment actions in the World Bank, International Monetary Fund, African Development Bank, and United Nations, and other international organization. She has close knowledge and understanding as to how these organizations employ, evaluate, suspend, or terminate staff members or international recruits, such as economists, accountants, engineers, attorneys, financial analysis, agriculturalists, and development specialists. She was educated at University of Zimbabwe, BL (Bachelor of Law) and University of Zimbabwe, LL.B (Bachelor of Laws).

## Exhibit 23

**Declaration of Jamshyd (Jim) M. Zadeh**

STATE OF TEXAS

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COUNTY OF TARRANT

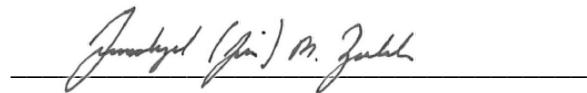
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I declare under penalty of perjury that: (1) I am one of the counsel of record for Plaintiff in the case styled Aaron Hirsch, individually and on behalf of others similarly situated v. USHealth Advisors, LLC and USHealth Group, Inc., pending in the United States District Court, Northern District of Texas, Fort Worth Division and bearing Civil Action No. 4:18-cv-00245-P, (2) I have executed this Declaration in that capacity; and (3) I declare under penalty of perjury that the following statements are true and correct and based upon my personal knowledge.

I am President of the Law Office of Jim Zadeh, P.C. I have been licensed to practice in the State of Texas since 1988 and the Northern District of Texas since 1989. From 1988 to 1993, I worked as an associate at Shannon, Gracey, Ratliff & Miller in Fort Worth, Texas handling primarily commercial litigation cases. From 1993 to 2001, I was an associate and then a partner at Bourland, Kirkman, Seidler & Evans. During this time, I handled civil litigation matters, including mass tort defense and commercial litigation. I opened the Law Office of Jim Zadeh, P.C. on January 1, 2002 and have worked there continuously since that time. Law Office of Jim Zadeh, P.C. has handled mass tort defense cases and mass tort plaintiff's cases, personal injury, first party insurance cases on behalf of insureds, employment matters and Telephone Consumer Protection Act claims.

I was a member of the Silica MDL Plaintiff's Executive Committee in the nationwide silica litigation MDL, *In Re Silica Products Liability Litigation*, MDL Docket No. 1553, in the United States District Court, Southern District of Texas, Corpus Christi Division. I have served as counsel for a brake manufacturer in over 1,000 Texas asbestos related lawsuits, have served as counsel for plaintiffs in over 1,000 Texas silica related claims and have served as Plaintiff's counsel in over 500 Mississippi silica related claims. I have handled previous Telephone Consumer Protection Act claims. Additionally, I previously represented a company engaged in telemarketing and advised on the best practices to comply with the TCPA.

SIGNED this 30th day of April, 2020.



Printed Name: Jamshyd (Jim) M. Zadeh

## Exhibit 24

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**AARON HIRSCH, ET AL.,**

**Plaintiff,**

**v.**

**USHEALTH ADVISORS, LLC, ET AL.,**

**Defendants.**

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**Civil Action No. 4:18-cv-245-P**

**DECLARATION OF WARREN T. BURNS**

I, Warren T. Burns, declare under penalty of perjury of the laws of the State of Texas that the following statements are true and correct and based upon my personal knowledge:

1. I am a member in good standing of the bar of Texas.
2. I represent Plaintiff Aaron Hirsch, individually, and all others similarly situated in the above-captioned action. I submit this declaration in support of Plaintiff's Motion for Class Certification.
3. I am a founding Partner of Burns Charest LLP ("Burns Charest"). Prior to forming Burns Charest, I was a partner at Susman Godfrey LLP, a law firm nationally recognized for its representation of plaintiffs in class actions in courts across the country.
4. Burns Charest possesses considerable experience—and has experienced considerable success—in prosecuting complex class actions in courts across the country. The firm has quickly gained a reputation as a leading complex litigation boutique. Burns Charest lawyers have been selected to lead numerous cases of national importance and scope. The firm also has an active practice representing individuals and businesses as plaintiffs in, among other matters, high-stakes antitrust and commercial litigation disputes. Across all of its practice areas,

the firm prides itself in not only litigating cases, but in taking them to trial if necessary.

5. Now at 27 lawyers strong, with offices in Dallas and New Orleans, Burns Charest has been appointed to leadership positions in the following class actions: In re German Automotive Manufacturers Antitrust Litigation, No. 17-MD-2796 (N.D. Cal.) (lead counsel); In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices and Antitrust Litigation, No. 17-MD-2785 (D. Kan.) (co-lead counsel); In re Domestic Airlines Antitrust Litigation, No. 15-MC-01404 (D.D.C.) (executive committee member; \$60 million in partial settlements); In re West Texas Intermediate Crude Oil Commodities and Antitrust Litigation, No. 11-CV-3600 (S.D.N.Y.) (co-lead counsel; \$16.5 million settlement); In re Anadarko Oil and Gas Lease Antitrust Litigation, No. CIV-16-0209-HE (W.D. Okla.) (co-lead counsel; \$6.95 million settlement); Kjessler v. Zaappaaz, Inc., et al., No. 18-CV-00430 (S.D. Tex.) (lead counsel); Bhatia, et al., v. 3M Company, No. 16-CV-1304 (D. Minn.) and In re Vehicle Carriers Antitrust Litigation, No. 13-CV-3306 (D.N.J.) (co-lead counsel).

6. Attached hereto as Exhibit A are true and correct copies of excerpts from the Burns Charest website, including information about the firm, its antitrust and class action practice, and my individual biography.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 30, 2020 at Dallas, Texas.



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Warren T. Burns, Texas Bar No. 24053119  
**BURNS CHAREST LLP**  
900 Jackson Street, Suite 500  
Dallas, TX 75202  
Telephone: (469) 904-4550  
Facsimile: (469) 444-5002  
wburns@burnscharest.com

*Attorneys for Plaintiff and Proposed Class*



# EXHIBIT A

## Burns Charest LLP

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Dallas  
900 Jackson Street, Suite 500  
Dallas | Texas | 75202  
Tel: (469) 904-4550

New Orleans  
365 Canal Street, Suite 1170  
New Orleans | Louisiana | 70130  
Tel: (504) 799-2845

Denver  
5290 Denver Tech Center Parkway, Suite 150  
Denver | Colorado | 70130  
Tel: (720) 630-2092

[www.burnscharest.com](http://www.burnscharest.com)

# About Us

Burns Charest is a young firm with a dynamic and impressive pedigree. Our founders were partners and attorneys at some of the finest commercial litigation boutiques in the nation. In 2015, we came together to build a new, aggressive platform to pursue our clients' interests.

We know that experience matters to clients and judges. And we have it. Our lawyers have actually tried a complex class action to verdict, served as co-lead counsel in multi-district litigation, secured a \$106 million judgment in the first of the 2008 mortgage meltdown cases to go to trial, obtained significant settlements in royalty-owner disputes, and regularly represented individuals and businesses in complex, bet-the-company cases.

We currently serve as co-lead counsel in national antitrust and commodity class actions. We represent numerous royalty owners in disputes against oil and gas giants. We serve hundreds of individuals whose lives have been threatened by exposure to asbestos. And we are helping landowners clean up decades of environmental damage.

We have a strong team. Our lawyers are some of the most experienced and talented of their generation, and we are happy to match our credentials against others.

Our focus is on the future. We believe firmly that our nation's legal system was designed to protect individuals and businesses from the wrongdoing of others and to assure a level playing field. As lawyers, we have an incredibly important role to play in making that system work for our clients. And we will not shy away from a fight to protect their interests.

## We are Burns Charest LLP.

# Why We Win

We are *trial lawyers*. We are not litigators.

What is the difference? From day one, we focus on how we are going to win your case at trial. We know from experience that success in the courtroom begins with a well-planned and efficient case strategy that focuses on what truly matters.

Our focus is not on the billable hour. We prefer to work under fee agreements that reward success and efficiency. By fully aligning our clients' interests with our own, we are able to focus on success.

We work smartly. In each case we conduct discovery and motion practice in a way that advances our client's goals. We identify key witnesses and documents, and then focus our efforts on how to tell our client's story through targeted depositions and discovery.

Many firms preach efficiency; we practice it. Our clients' interests are not best served by assigning multiple lawyers to perform the same task. That is not our style. We adhere to our Texas roots: One Riot, One Ranger.

The best lawyers are not those who scream loudest. We do not advance our clients' cases by engaging in meaningless disputes with our adversaries. That wastes time and money. But be assured, we know what's important and we will not shy away from zealously advancing our clients' interests.

We engage our clients each step of the way as members of the team. They help shape strategy. They participate in every significant decision.

We know how to communicate complex ideas to judges and juries. We use innovative techniques and technologies to advocate for our clients at trial, employing creative means to impart their story and serve their interests.

## We are Burns Charest LLP.

Corporations and special interest groups have spent millions of dollars in an effort to convince Americans that class actions are bad for business. Why? Because they know that class actions are the single most effective means of compensating Americans for corporate wrongdoing.

At Burns Charest, we believe that class actions are often the only way to assure that victims of corporate greed and unlawful conduct are compensated for their damages. Class actions are an integral part of our system of civil justice. We firmly believe in this fundamental right and are willing to stake our own financial resources on our clients' behalf.

## Antitrust

Antitrust laws are essential to our nation's economy. Without them, businesses would be free to conspire to charge American consumers higher prices. And monopolists would be able to squeeze competitors out of the market.

Antitrust laws are so important that state and federal governments have empowered American consumers and businesses to bring legal claims to enforce these laws, and in some cases they may obtain three times their damages if successful. We gladly represent those who have been harmed and are seeking to enforce their rights.

We have deep experience in representing classes and individuals in antitrust suits against some of the world's largest corporations. We currently serve as co-lead counsel on behalf of a class of American car purchasers in the Vehicle Carrier Services Antitrust Litigation case that is pending in federal court in New Jersey. We are also co-lead counsel in the Crude Oil Commodity Futures Litigation, where we brought antitrust and Commodity Exchange Act claims against individual traders and companies on behalf of a nationwide class. Our lawyers have served as co-lead counsel in other national class action cases before forming Burns Charest. And we have obtained hundreds of millions of dollars for the classes we have represented.

## Consumer Class Actions

Federal and state governments have also enacted laws to safeguard Americans' privacy rights and to protect consumers and businesses from unfair practices. These laws often provide individuals and businesses a means to bring claims against defendants for unlawful actions.

We have brought claims on behalf of American consumers and businesses in cases throughout the United States. Our consumer cases have involved federal and state privacy and consumer protection laws, as well as state statutes regulating trade practices.

# Warren T. Burns

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wburns@burnscharest.com

You want a lawyer who understands your concerns and who will fight to achieve your goals. You want a lawyer who believes in our system and knows how to succeed in it. And most importantly you want a lawyer who is going to give you candid and meaningful advice. I am that lawyer.

I focus my practice on high-stakes, multidistrict class action, mass tort, and commercial cases. I have litigated and tried cases involving price fixing, monopolization, breach of contract, intellectual property, business torts, consumer protection statutes, product liability, and personal injuries stemming from bad drugs and other products.

I achieve results. In 2012, I helped lead a trial team that took the first mortgage-backed-securities related case to trial. In a landmark and game-changing trial, we secured a \$106 million judgment on behalf of our client and obtained key pre-trial determinations that had a domino effect in related cases.

#### **Education and Background**

Where a man comes from is important. I think it can tell you a lot about their character and approach to litigation and trials.

I am from a small town in Mississippi called Kosciusko. My extended family on both sides has lived there for six generations. My upbringing had a profound impact on me. I learned the value of community—the importance of joining in the lives of those around you and of making a difference in them. Every day, my background helps me relate to witnesses and juries in ways that benefit my clients.

I spent my college years at Ole Miss. I played four years of rugby for the Ole Miss Rugby Football Club, starting each season as a second-row forward. I use the skills I learned on the rugby pitch everyday in litigation. In a fast moving match, you have to be prepared to play offense and defense intelligently. You have to capitalize quickly on your opponents' mistakes. And you have to bring maximum pressure at the right moment to win. The same is true in litigation.

After college, I moved to the District of Columbia to work in public relations and fundraising. I took a job as a junior fundraising staffer at the Basilica of the National Shrine of the Immaculate Conception, the largest Catholic church in the Americas. Within a year, I was promoted to serve as the Communications Director at the Basilica.

I next moved to the Lt. Joseph P. Kennedy, Jr. Institute, a non-profit organization dedicated to assisting people with developmental disabilities in their efforts to live full and complete lives. There, I served as the Director of Development and Public Relations.

Later, I moved to Asheville, North Carolina, to assume the role of Development Director at Riverlink, a regional non-profit organization. At Riverlink, our focus was on restoration of the French Broad River and developing the economy along its banks.

I left Riverlink to attend Tulane Law School. In 2004, I graduated summa cum laude and Order of the Coif, and received the John Minor Wisdom Award, Tulane's highest prize for graduating law students. I also served as Editor in Chief of the Tulane Law Review.

After law school, I clerked for the Hon. Paul J. Kelly, Jr. on the U.S. Court of Appeals for the Tenth Circuit.

I was elected in 2016 to the American Law Institute. The American Law Institute is the leading independent organization in the United States producing scholarly work to clarify, modernize, and improve the law.

Since 2015, I have been named each year to the Top 100 National Trial Lawyers.

Every year since 2014, I have been named to the International Who's Who of Competition Lawyers. And from 2011-2015, I was named a Texas Rising Star in Business Litigation.

I am an active member of the Dallas Bar Association and the American Bar Association.

I am also a member of the American Association for Justice and the Texas Trial Lawyers Association. And I am a Fellow in the Southern Trial Lawyers Association.

I sit on the Board of Advisory Editors of the Tulane Law Review, a national board comprised of distinguished alumni.

### Representative Cases

#### German Automotive Manufacturers

I am lead counsel for a class of American automobile dealerships who are suing every major German automobile manufacturer over a 20-year price fixing conspiracy. The case is proceeding in the Northern District of California.

#### Talcum Powder

I represent hundreds of women in one of the most important public health cases being litigated today. Despite numerous studies demonstrating a link between talcum powder usage and ovarian cancer, Johnson & Johnson failed to warn my clients and millions of other American women. My clients have since developed cancer and seek damages for their exposure. I sit on the executive committee in the national multi-district litigation.

#### Airline Price Fixing

I serve on the executive committee in *In re Domestic Airlines Antitrust Litigation* now pending in the District of Columbia. I represent millions of Americans who overpaid for airline tickets after the nation's largest carriers entered into an illegal conspiracy to fix prices and limit airline capacity.

#### Auto Parts Price Fixing

I previously served as co-lead counsel in *In re Automotive Parts Antitrust Litigation (2011-present)* in the Eastern District of Michigan. I personally negotiated settlements exceeding \$200 million with foreign defendants while successfully organizing and managing this complex case.

**"I have spent my career defending consumers and businesses from corporate greed and wrongdoing. I will be your champion."**

*- Warren T. Burns*

#### Vehicle Carriers

I am co-lead counsel for a class of millions of automobile purchasers who paid inflated shipping charges for their foreign-made automobiles. This case is currently pending before the Federal Maritime Commission.

#### EpiPens

I represent tens of thousands of American consumers and businesses in a multidistrict class action designed to recoup the overpayments my clients paid for the life-saving EpiPen device. I have been appointed co-lead counsel for the national class.

#### Oil & Gas Price Fixing

I represent hundreds of Oklahoma property owners who entered into oil and gas leases with two of the nation's largest gas companies. Unbeknownst to my clients, those same companies had agreed to fix the prices they were offering on gas leases and allocate the market between them. I have been appointed co-lead counsel for the class.

#### Dental Crowns

I represent thousands of American dentists who purchased faulty material from one of the nation's largest dental manufacturers. The dentists used the materials to create dental crowns, which failed at unprecedented rates. My clients are suing to recoup the damages they incurred to replace those crowns. I have been appointed co-lead counsel for the class.